

**Gregory W. O'Neill** (GO 1944)  
**Elizabeth A. McCoy** (EM 8448)  
Hill, Betts & Nash L.L.P.  
One World Financial Center  
200 Liberty Street, 26th Floor  
New York, New York 10281  
Tel.: (212) 839-7000  
Fac.: (212) 466-0514

**Carl D. Rosenblum** (LA Bar No. 02083) (Admitted *Pro Hac Vice*)  
**Eric Michael Liddick** (LA Bar No. 31237) (Admitted *Pro Hac Vice*)  
Jones, Walker, Waechter, Poitevent,  
Carrère & Denègre, L.L.P.  
201 St. Charles Avenue, 49th Floor  
New Orleans, Louisiana 70170  
Tel.: (504) 582-8000  
Fac.: (504) 582-8011

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**ARGO TURBOSERVE CORPORATION,**

**Plaintiff,**

**versus**

**DEAN ANGELLE AND DENISE ANGELLE,**

**Defendants.**

**CASE NO. 07 CV 8410 (RMB)  
(GWG)**

**DECLARATION OF  
ERIC MICHAEL LIDDICK IN  
REPLY TO PLAINTIFF'S  
MEMORANDUM IN  
OPPOSITION TO  
DEFENDANTS' MOTIONS TO  
DISMISS**

**ERIC MICHAEL LIDDICK** declares as follows:

1. I am a member of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, L.L.P., attorneys for Defendants, Dean Angelle and Denise Angelle.
2. I submit this declaration in support of Defendants' Reply to Plaintiff's Memorandum in Opposition to Defendants' Motions to Dismiss.
3. The following documents are attached hereto and made a part of this reply:

**Exhibit “12”** – E-mail string dated October 16, 2007 between Carl D. Rosenblum, Esq. and Steven J. Cohen, Esq.

**Exhibit “13”** – October 24, 2007 Letter from Carl D. Rosenblum, Esq. to Steven J. Cohen, Esq.

**Exhibit “14”** – Louisiana Secretary of State Detailed Record for D&D Pipe and Rentals, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New Orleans, Louisiana, this 11th day of April, 2008.

/s/ Eric Michael Liddick

Eric Michael Liddick (LA Bar No. 31237)  
(Admitted *Pro Hac Vice*)